

Message

From: Moon, Diane [Moon.Diane@epa.gov]
Sent: 6/26/2018 9:54:09 PM
To: Benevento, Douglas [benevento.douglas@epa.gov]; O'Connor, Darcy [oconnor.darcy@epa.gov]
Subject: RE: Dewey Burdock Project Draft EPA Permits

I set your meeting with Darcy on this for Monday (7/2) at 9:45.

I have a HOLD on Tues morning at 8:00 but have NOT confirmed a date or time with Blake. I did send him a short email advising I would get back with him about his request when you returned.

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From: Benevento, Douglas
Sent: Friday, June 22, 2018 6:40 AM
To: O'Connor, Darcy <oconnor.darcy@epa.gov>; Moon, Diane <Moon.Diane@epa.gov>
Subject: FW: Dewey Burdock Project Draft EPA Permits
Importance: High

Darcy, When I'm back the week after next let's set up a time to talk. Diane if you would not set a discussion with Blake until after I can speak with Darcy I would appreciate it.

From: Blake Steele [mailto:blake@azargaresources.com]
Sent: Friday, June 22, 2018 2:26 AM
To: Benevento, Douglas <benevento.douglas@epa.gov>
Cc: O'Connor, Darcy <oconnor.darcy@epa.gov>; John Mays <jmays@powertechuranium.com>
Subject: [SPAM-Sender] Dewey Burdock Project Draft EPA Permits
Importance: High

Dear Doug,

I trust this finds you well.

It has been approximately six months since we met in Denver and almost 12 months since Powertech lodged its comments on the draft EPA permits for the Dewey Burdock Project in South Dakota.

In the December 2017 meeting, we discussed a number of areas of concern that Powertech had with the draft EPA permits, including, but not limited to, unprecedented requirements for the ISR uranium industry that were being uniquely imposed on the Dewey Burdock Project and the lack of historical data to support the implementation of these unprecedented requirements. Powertech had three specific asks: 1) that the permits be re-drafted to be broadly consistent with other ISR uranium permits, 2) that a schedule to completion be developed and 3) that adequate staffing resources be allocated to the Dewey Burdock permitting process so that public comments could be addressed on a timely basis.

To date, Powertech is disappointed with the progress that has been made. A timeline to completion has not been developed, though additional resources have been allocated to the process, we understand that these resources have been pulled away to work on other projects, verbally discussed timelines have not been upheld, questions continue to be asked of items that are

outside of the EPA's jurisdiction and no questions/comments have been raised on one of the most significant areas of concern/comment from Powertech on the draft EPA permits – the unprecedented permit requirements that appear to parallel the proposed but not yet approved revisions to 40 CFR 192 (these questions/comments were originally expected to be received in March 2018 based on discussions with the EPA). More than six months has passed since our December 2017 meeting and it appears that little progress has been made.

I would appreciate the opportunity to discuss our concerns on a conference call to clarify a plan to expedite the finalisation of the these permits. In terms of timing, Monday to Wednesday of next week or the entire following week works for us (early in the morning or late in the afternoon MT is preferred).

Best,
Blake Steele
President & CEO